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Attorney for Defendant
JOEY DONALD STEWART CAMPBELL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-206-DJC
)	
Plaintiff,)	STIPULATION FOR MODIFICATION OF
)	CONDITIONS OF PRETRIAL RELEASE;
vs.)	PROPOSED ORDER
)	
JOEY DONALD STEWART)	Judge: Hon Sean C. Riordan
CAMPBELL,)	
)	
Defendant.)	

The defendant, JOEY DONALD STEWART CAMPBELL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Roger Yang, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Campbell's pretrial release to replace the condition of location monitoring: curfew with **"location monitoring technology as directed by the pretrial services officer"**. Mr. Campbell's assigned pretrial services officer has requested this stipulated modification in order to allow Pretrial Services to switch Mr. Campbell over to a GPS monitor and permit his travel to the Central District of CA on January 5, 2025, for the purpose of his self-surrender to custody for the service of his sentence on January 6, 2025.

Mr. Campbell has been on pretrial release in this district since October 2021, on a \$100,000 secured appearance bond. *See* Dkt. 12. Mr. Campbell is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Campbell is currently subject to curfew. At the time of his sentencing hearing, Mr. Campbell was ordered

1 to self-surrender at the designated BOP facility for service of his custodial sentence on January 6,
2 2025. BOP has designated Terminal Island, in the Central District of CA, as the facility where
3 Mr. Campbell must self-surrender.

4 The Pretrial Services Officer has requested that Special Condition # 19 be modified to
5 state:

6 "You must participate in the following location monitoring program component and
7 abide by all the requirements of the program, which will include **location monitoring**
8 **technology as directed by the pretrial services officer**. You must comply with all
9 instructions for the use and operation of the location monitoring technology as given to
10 you by the Pretrial Services Agency and employees of the monitoring company. You
11 must pay all or part of the costs of the program based upon your ability to pay, as
12 determined by the pretrial services officer."

13 The parties agree that this modification is appropriate, so as to provide the Pretrial
14 Services Officer with the discretion to approve transferring Mr. Campbell to the GPS monitoring
15 program and permitting him to travel to the Central District on January 5, 2025, where he will
16 stay overnight in a hotel with his mother, before self-surrendering on January 6, 2025 at
17 Terminal Island.

18 The parties further stipulate that the Court order include instructions that Mr. Campbell is
19 required to self-surrender on 1/6/2025 in the Central District of CA; therefore, he will be
20 traveling to that district on 1/5/2024 (overnight travel) and will spend the night at a local hotel in
21 the Central District prior to his self-surrender. With the assistance of his mother, Mr. Campbell
22 has already provided his hotel booking information to his Pretrial Services Officer. Following
23 his self-surrender on January 6, 2025, Mr. Campbell's mother will be required to collect the
24 location monitoring equipment (the charger and the ankle transmitter) and return them to the
25 Pretrial Services Office in the Eastern District of CA upon her return from travel.

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1 The parties do not request a hearing in this matter in light of this stipulation.

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4 DATED: December 27, 2024

Respectfully submitted,
HEATHER E. WILLIAMS
Federal Defender

5 /s/ Megan T. Hopkins

6 MEGAN T. HOPKINS

Assistant Federal Defender

7 Attorney for JOEY DONALD STEWART CAMPBELL

8
9 DATED: December 27, 2024

PHILLIP A. TALBERT
United States Attorney

11 /s/ Roger Yang

12 ROGER YANG

Assistant United States Attorney

13 Attorney for the United States
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~~PROPOSED~~ ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Condition of Release #19 for defendant, Joey Donald Stewart Campbell, is hereby amended to:

"You must participate in the following location monitoring program component and abide by all the requirements of the program, which will include **location monitoring technology as directed by the pretrial services officer**. You must comply with all instructions for the use and operation of the location monitoring technology as given to you by the Pretrial Services Agency and employees of the monitoring company. You must pay all or part of the costs of the program based upon your ability to pay, as determined by the pretrial services officer."

It is FURTHER ORDERED that Mr. Campbell shall self-surrender on 1/6/2025 in the Central District of CA; therefore, he may travel to that district on 1/5/2024 (overnight travel) and spend the night at a local hotel in the Central District of CA as approved in advance by the Pretrial Services Officer. Following his self-surrender on January 6, 2025, Mr. Campbell's mother shall collect the location monitoring equipment (the charger and the ankle transmitter) and return them to the Pretrial Services Office in the Eastern District of CA upon her return from travel.

All other conditions of pretrial release shall remain in force.

Dated: December 30, 2024



CHI SOO KIM
UNITED STATES MAGISTRATE JUDGE